

EXHIBIT C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
HC2, INC.,

Plaintiff,

1:20-cv-03178-LJL

-against-

RESPONSE TO
REQUEST FOR ADMISSIONS

ANDREW DELANEY,

Defendant.
-----X

Responding Party responds to Propounding Party's First Set of Requests for Admissions
as follows:

Request No.

1. Denied. Defendant was not able to find proof within his records of the execution of this document.
2. Admitted.
3. Denied.
4. Admitted.
5. Denied.
6. Denied.
7. Denied.
8. Admitted; except for other unknown John Does.
9. Denied.
10. Denied.
11. Denied.
12. Denied.
13. Denied.
14. Denied.
15. Denied.
16. Denied. Your Exhibit 5 is a "Confidentiality Agreement" and not a "non-disclosure agreement".
17. Denied.
18. Denied. The agreement dated September 30, 2019 is a "Confidentiality Agreement."
19. Admitted.
20. Denied.
21. Denied.
22. Admit in part and denied in part. He spoke to Law360 one time and has subsequently refused to speak to them.
23. Denied.
24. Denied.
25. Denied that Defendant "furnished the information."

26. Admitted.
27. Cannot truthfully admit or deny the matters set forth in this request because he does not have knowledge of these matters, and despite reasonable inquiry into the matter by reviewing all of the records and information available to him, to obtain information from which the truth or falsity of the matter might be learned.
28. Admitted.
29. Denied.
30. Denied that “Wilmer provided You confidential Toyota information” but admit that the database contained some confidential information.
31. Denied. He admits that he is an attorney but denies that he was doing anything other than Thai language document review.
32. Denied.
33. Denied that “confidential Toyota information” was ever defined to Defendant.
34. Denied.
35. Denied.
36. Denied.
37. Denied.
38. Denied.
39. Denied.

Dated: May 13, 2020
New York, New York

Respectfully submitted,
/s/Robert Rotman, Esq.
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Counsel for Defendant/Responding Party